

**Description and Justification
for
Securus Technologies, Inc.’s
Mandatory Data Collection Report**

A. General Notes.

1. General. This response to the Mandatory Data Collection requirement comports with the holding in *Global Tel*Link v. Federal Communications Commission*, 866 F.3d 397 (D.C. Cir. 2017) (the “GTL Decision”). Securus’ response includes intrastate data, and the submission of this information should not be viewed as a waiver of Securus’ rights, and Securus reserves all rights regarding the Federal Communication Commission’ authority to collect data from inmate calling services (“ICS”) providers regarding intrastate ICS matters.
2. Video Visitation Data. Securus’ response of “not applicable (n/a)” are based upon the holding of the GTL Decision regarding lines of business unrelated to ICS. GTL Decision, at 416-7.

B. Company Information.

1. Rate Of Return Used in Estimating ICS Costs. [REDACTED]
2. Affiliates. Securus has no Affiliates under the definition stated in the Commission’s Instructions available at <https://www.fcc.gov/general/ics-data-collections>.

C. Total ICS Data.

1. Total ICS Cost. The responses for this item are taken from Securus’ audited financial statements, and may vary from the aggregate of the reported facility-specific costs. Securus’ accounting systems track costs as a company, and not on a customer or facility level. The facility-specific costs are taken from a separate data base used to track profits and losses for each site. While that data is the best available for the customer / facility-level tracking, there may be additional adjustments for purposes of company accounting.
2. Total ICS Revenues. The responses for this item are taken from Securus’ audited financial statements and as reported to the Commission in Securus’ 499A reports. Securus’ accounting systems track revenues as a company, and not on a customer or facility level. The facility-specific revenues are taken from a separate data base used to track profits and losses for each site. While that data is the best available

for the customer / facility-level tracking, there may be additional adjustments for purposes of company accounting.

D. Facility-Level ICS Data.

1. Average Daily Population (ADP). In the ordinary course of business, Securus does not track ADP at the facility level. Securus only tracks ADP at the contract/customer level. To the extent a customer has multiple facilities, Securus can only report the customer's aggregate ADP under each listed facility. Further, Securus does not keep historical ADP information, only has data collected from customers from time-to-time, and does not have ADP information retrievable on a year-by-year basis. The information presented for all years is the current data Securus has available.
2. Maximum Call Duration. Securus' systems tracks only the present maximum call duration for facilities, and does not retain historical durations retrievable on a year-by-year basis. As such this information is only available for the present call durations.
3. Third Party Transaction Fees (TPTFs). Securus accounts (whether funded through third-party transfers and transactions, or funded directly through Securus) are not specific to any facility; an account may be used to fund ICS to multiple facilities. As a result, Securus does not assign MoneyGram and Western Union transactions to specific facilities.

[REDACTED]

[REDACTED]

[REDACTED]

MoneyGram and Western Union are not Affiliates of Securus.

At an aggregate level, the following table provides the total number of MOU associated with accounts (a) funded by CCPS only, (b) funded by CCPS and other methods, and (c) funded by other methods only:

[illegible]

Also note: A per-minute rate cannot be derived by dividing the aggregate amount of funding events by the total MOU, as (a) some funds are refunded, (b) some funds carry over from the previous year, and (c) there are taxes and fees applicable to calls in addition to the per-minute rates.

7. Total International ICS Costs. Securus' accounting systems does not track costs by facility. For purposes of this report, costs are allocated on a facility-basis based on the proportion of that facility's total ICS revenue compared to total Securus' ICS revenues.